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By ECF

The Hon. Lewis A. Kaplan
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Alan Kaufman*, 19 Cr. 504 (LAK)

Dear Judge Kaplan:

We write on behalf of Defendant Alan Kaufman with respect to the draft verdict form and respectfully request that, under Count 1, the Court add the following question, consistent with its “Objects of the Conspiracy” instruction to the jury:

If you checked “Guilty,” is your unanimous verdict based on: the first alleged object of the conspiracy, a violation of 18 U.S.C. § 215(a)(1); the second alleged object of the conspiracy, a violation of 18 U.S.C. § 215(a)(2); or both?

Very truly yours,

/s/ Nelson A. Boxer

Nelson A. Boxer
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Counsel for Alan Kaufman